

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

In re:

ADA'S CREATIONS, INC.
Debtor-in-Possession

B.K. NO. 15-11836
Chapter 11

Isaias Leonel Terrero
Acelia A. Terrero
Debtors-in-Possession

B.K. No. 15-11812
Chapter 11

**DEBTORS' MOTION FOR JOINT ADMINISTRATION
OF CHAPTER 11 CASES**

Now come Ada's Creations, Inc. and Isaias Leonel Terrero and Acelia Terrero, Debtors-in-Possession, in their respective Chapter 11 Petitions and move this Court for an entry of an Order for the joint administration of these related Chapter 11 cases.

The basis for the Debtors' Motion is as follows:

1. That on September 14, 2015 the Debtors, Isaias Leonel Terrero and Acelia Terrero, filed for relief under Chapter 13 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Rhode Island to prevent a foreclosure on the commercial premises located at 1137 Broad Street, Providence, Rhode Island, which is presently in the names of the Debtors.
2. That the Debtors, Isaias Leonel Terrero and Acelia Terrero, are also the sole shareholders of Ada's Creations, Inc. (hereinafter referred to as "Ada's"), which has operated a catering and wedding business at this same address for more than twelve (12) years.

3. That on September 24, 2015, Ada's Creations, Inc. filed an emergency Petition for relief under Chapter 11 of the United States Bankruptcy Code, to prevent the City of Providence from revoking its catering and liquor licenses at 1137 Broad Street, Providence, Rhode Island, based upon alleged failure to comply with a payment schedule for police detail work.

4. That on September 25, 2015, the Chapter 13 Debtors filed a Motion to Convert from their Chapter 13 case to a Chapter 11 case.

5. That on October 14, 2015, Chapter 13 Debtors' Motion to Convert was granted by this Court.

6. Under the provisions of Bankruptcy Rule 1015(b), the Court can order the joint administration of estates for a Debtor and an affiliate. An "affiliate" as defined under 11 U.S.C. 101(2) includes an "entity that operates the business or substantially all of the property of the Debtor under a lease or operating agreement.

7. Debtors, Isaias Leonel Terrero and Acelia Terrero, are the record owners of the real estate at 1137 Broad Street, Providence, Rhode Island, but all of the business at said address is carried on by "Ada's", and all of the creditors in both cases have historically been paid by "Ada's".

8. The joint administration of these cases will streamline the Chapter 11 proceedings and reduce and eliminate unnecessary costs associated with maintaining two separate proceedings. On the other hand, there will be no prejudice to creditors from the joint administration of these matters.

9. The instant Motion seeks only a joint administration of the matters, and not a substantive consolidation. The Debtors, however, retain their rights to seek a

substantive consolidation at a later time.

WHEREFORE, the Debtors pray that this Court enter an Order authorizing the joint administration of the estates of Ada's Creations, Inc. and Isaias Leonel Terrero and Acelia Terrero.

Ada's Creations, Inc. and Isaias Leonel
Terrero and Acelia Terrero
By their attorney,

/s/ Douglas H. Smith #2219
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Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

I hereby certify that on October , 2015, I electronically filed Debtors' Motion for Joint Administration of Chapter 11 Cases with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically.

Gary L. Donahue

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Sandra Nichols on behalf of
Assistant U.S. Trustee
Gary L. Donahue

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And I hereby certify that on October 15th, 2015, I have mailed by United States Postal Service, the document and a copy of the Notice of Electronic Filing to the following non CM/ECF participants: None

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DW/ADAS